

Exhibit 6

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

J.G.,)	
)	
Plaintiff,)	
)	Civil Action File
v.)	No. 1:20-cv-05233-MLB
)	
NORTHBROOK INDUSTRIES, INC.,)	
d/b/a UNITED INN AND SUITES,)	
)	
Defendant.)	

**DEFENDANT NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES' RESPONSE TO
PLAINTIFF'S FIRST SUPPLEMENTAL SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Defendant Northbrook Industries, Inc. d/b/a United Inn and Suites ("Northbrook") hereby serves its response to the First Supplemental Set of Requests for Production of Documents served by Plaintiff J.G. (the "Requests").

GENERAL OBJECTIONS

1. Northbrook objects to the Requests in their entirety, including the Definitions and Instructions contained therein, to the extent the Requests seek to impose obligations on Northbrook greater than those imposed by applicable law.

2. Northbrook objects to the Requests in their entirety, including the Definitions and Instructions contained therein, to the extent the Requests seek the production of information or materials that are protected by the attorney-client privilege and/or the work product doctrine and/or that were prepared in anticipation of litigation by or for a party or its representative.

RESPONSES

Subject to the foregoing General Objections, and expressly without waiving the same, Northbrook responds to the individual requests as follows:

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 1:

Please produce all Documents and information You and/or Your owners, agents, employees, or representatives received at any hospitality trainings, hospitality conferences, or hospitality meetings, including but not limited to Documents and information received at meetings with Dekalb County authorities.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 2:

Please produce all text messages that You and/or Your owners, agents, employees, or representatives sent to or received from Officer Webber, Officer McClelland, and/or any other officers or guards who provided security services at the Property at any point during the period January 1, 2017 - December 31, 2019.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 3:

Please produce all text messages that You and/or Your owners, agents, employees, or representatives sent or received during the period January 1, 2017 – December 31, 2019 relating to the Property.

RESPONSE:

Northbrook objects to Request No. 3 as overbroad and unduly burdensome, and as seeking documents not relevant to any claim or defense in this litigation.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 4:

Please produce all emails and attachments sent from or sent to Your email address that refer or relate to safety, security, crime, commercial sex, prostitution,

sex trafficking, law enforcement, code requirements, code violations, customer reviews, hospitality standards, hospitality associations, and/or training. *[The response to this Request should include emails and attachments sent from or sent to unitedinn4649@gmail.com as well as any other email addresses You or Your owners, agents, employees, or representatives used to conduct Your business.]*

RESPONSE:

Northbrook objects to Request No. 4 as vague, overbroad and unlimited in time and scope. Subject to the foregoing objection, and expressly without waiving the same, Northbrook will conduct a search for the requested documents for the time period from January 1, 2017 to December 31, 2019.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 5:

Please produce all payroll Documents and information relating or referring to persons who worked at the Property for any portion of the period January 1, 2017 through December 31, 2019, regardless of whether those persons were employees, independent contractors, or otherwise. *[The response to this Request should include but not be limited to K-1s, W-2s, 1099s, and other formal payroll documentation.]*

RESPONSE:

Northbrook objects to this Request as overbroad and as seeking documents not relevant to any claim or defense in the litigation. Subject to the foregoing objection, and expressly without waiving the same, Northbrook will produce requested payroll information.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 6:

Please produce all Documents and information relating to reviews performed prior to hiring any of the persons who worked at the Property for any portion of the period January 1, 2017 through December 31, 2019, regardless of whether those persons were employees, independent contractors, or otherwise. *[The response to this Request should include but not be limited to criminal history checks, background checks, and the like.]*

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 7:

Please produce all Documents and information relating or referring to any of the following names, Quinton Antwan Bush, Quinton Bush, Quinton Antwan,

Antwan Bush, and/or Bush, including but not limited to Documents and information relating to rooms reserved at the Property.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 8:

Please produce all Documents and information relating or referring to any of the following names, Raevyn Rustemeyer-Broncheau, Raevyn Rustemeyer, Raevyn Broncheau, Rustemeyer-Broncheau, Rustemeyer, and/or Broncheau, including but not limited to Documents and information relating to rooms reserved at the Property.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 9:

Please produce all Documents and information relating or referring to any of the following names, Endco Corey Forrest, Endco Corey, Endco Forrest, Cory Forrest, Endco, and/or Forrest, including but not limited to Documents and information relating to rooms reserved at the Property.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 10:

Please produce all Documents and information relating or referring to Victoria Thomas, including but not limited to Documents and information relating to rooms reserved at the Property.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 11:

Please produce all Documents and information relating or referring to Keiron Perry, including but not limited to Documents and information relating to rooms reserved at the Property.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 12:

Please produce all Documents and information relating or referring to rental of room 117 in 2018, including but not limited to room reservation Documents and information.

RESPONSE:

Northbrook objects to this Request as unduly burdensome, in that its computer system does not allow for a search command that would enable the user to compile the information sought.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 13:

Please produce all Documents and information relating or referring to rental of room 145 in 2018, including but not limited to room reservation Documents and information.

RESPONSE:

Northbrook objects to this Request as unduly burdensome, in that its computer system does not allow for a search command that would enable the user to compile the information sought.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 14:

Please produce all Documents and information relating or referring to Your business licenses with any government entity (e.g., state, city, county, etc.) for the years 2017-2019.

RESPONSE:

Northbrook will produce responsive documents.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 15:

Please produce all Documents You and/or Your owners, agents, employees, or representatives provided to and/or received from banks, lenders, and/or financial institutions in an effort to obtain financing, loans, and/or monetary funds in connection with the Property.

RESPONSE:

Northbrook objects to Request No. 15 as overbroad, unduly burdensome, unlimited in time and scope, and seeking documents not relevant to any claim or defense in this litigation.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 16:

Please produce all Documents referring or relating to loans made to You and/or Your owners, agents, employees, or representatives for the benefit of the Property, including but not limited to loan agreements, promissory notes, credit statements, and statements of debt.

RESPONSE:

Northbrook objects to Request No. 16 as overbroad, unduly burdensome, unlimited in time and scope, and seeking documents not relevant to any claim or defense in this litigation.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 17:

Please produce all Your financial statements for 2017 – 2019.

RESPONSE:

Northbrook objects to Request No. 17 as seeking documents not relevant to any claim or defense in this litigation.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 18:

Please produce all Your check register/s for 2017 – 2019.

RESPONSE:

Northbrook objects to Request No. 18 as seeking documents not relevant to any claim or defense in this litigation.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 19:

Please produce the partnership agreement between Your owners, Mr. Shareef and Mr. Sabharwal.

RESPONSE:

Northbrook objects to Request No. 19 as seeking documents not relevant to any claim or defense in this litigation.

SUPPLEMENTAL REQUEST FOR PRODUCTION NO. 20:

Please produce AS&TS's bylaws.

RESPONSE:

Northbrook objects to Request No. 20 as seeking documents not relevant to any claim or defense in this litigation.

/s/ Dana M. Richens

Dana M. Richens
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Attorney for Defendant
Northbrook Industries, Inc.
d/b/a United Inn and Suites

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served all parties with the within and foregoing **DEFENDANT NORTHBROOK INDUSTRIES, INC., d/b/a UNITED INN AND SUITES' RESPONSE TO PLAINTIFF'S FIRST SUPPLEMENTAL SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** via electronic mail to the following:

Richard W. Hendrix, Esq.
rhendrix@finchmccranie.com

David H. Bouchard, Esq.
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Jonathan S. Tonge, Esq.
jtonge@atclawfirm.com

Patrick J. McDonough, Esq.
pmcdonough@atclawfirm.com

This 27th day of March, 2023.

/s/ Dana M. Richens

Exhibit 6a

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

J.G.,)	
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Plaintiff,)	
)	Civil Action File
v.)	No. 1:20-cv-05233-MLB
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NORTHBROOK INDUSTRIES, INC.,)	
d/b/a UNITED INN AND SUITES,)	
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Defendant.)	

**DEFENDANT NORTHBROOK INDUSTRIES, INC.,
d/b/a UNITED INN AND SUITES' RESPONSES TO
PLAINTIFF'S FIRST SUPPLEMENTAL SET
OF CONTINUING INTERROGATORIES**

Defendant Northbrook Industries, Inc. d/b/a United Inn and Suites ("Northbrook") hereby serves its objections and answers to the First Supplemental Set of Continuing Interrogatories served by Plaintiff J.G. (the "Interrogatories").

GENERAL OBJECTIONS

1. Northbrook objects to the Interrogatories in their entirety, including the Definitions and Instructions contained therein, to the extent the Interrogatories seek to impose obligations on Northbrook greater than those imposed by applicable law.

2. Northbrook objects to the Interrogatories in their entirety, including the Definitions and Instructions contained therein, to the extent the Interrogatories seek the production of information or materials that are protected by the attorney-client privilege and/or the work product doctrine and/or that were prepared in anticipation of litigation by or for a party or its representative.

RESPONSES

Subject to the foregoing General Objections, and expressly without waiving the same, Northbrook responds to the individual interrogatories as follows:

SUPPLEMENTAL INTERROGATORY NO. 1:

Please identify all persons who worked at the Property at any time from January 1, 2017 – December 31, 2019, and separately, please identify whether any of those persons had their employment terminated (whether for performance or otherwise). If any of those persons had their employment terminated, please explain the reasons for the termination.

RESPONSE:

Northbrook will produce documents sufficient to provide the information sought in this interrogatory.

SUPPLEMENTAL INTERROGATORY NO. 2:

Please identify all rooms reserved at the Property and the names of the guests in which the rooms were reserved in the months of October 2018 and/or November 2018 for which the duration of the reservation was 30 days or greater.

RESPONSE:

Northbrook objects to this Interrogatory as unduly burdensome, in that its computer system does not allow for a search command that would enable the user to compile the information sought.

/s/ Dana M. Richens
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Attorney for Defendant
Northbrook Industries, Inc.
d/b/a United Inn and Suites

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served all parties with the within and foregoing **DEFENDANT NORTHBROOK INDUSTRIES, INC., d/b/a UNITED INN AND SUITES' RESPONSES TO PLAINTIFF'S FIRST SUPPLEMENTAL SET OF CONTINUING INTERROGATORIES** via electronic mail to the following:

Richard W. Hendrix, Esq.
rhendrix@finchmccranie.com

David H. Bouchard, Esq.
david@finchmccranie.com

Jonathan S. Tonge, Esq.
jtonge@atclasfirm.com

Patrick J. McDonough, Esq.
pmcdonough@atclawfirm.com

This 27th day of March, 2023.

/s/ Dana M. Richens